

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

COMMANDER EMILY SHILLING, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

No. 2:25-cv-241-BHS

**UNOPPOSED MOTION TO
EXPEDITE THE NOTING DATE
FOR PLAINTIFFS' MOTION FOR
LEAVE TO FILE A SURREPLY IN
OPPOSITION TO DEFENDANTS'
MOTION TO STAY PENDING
APPEAL**

**NOTE ON MOTION CALENDAR:
AUGUST 28, 2025**

Pursuant to Local Civil Rules 7(d)(1), Plaintiffs, by and through their counsel, hereby respectfully move to expedite the noting date for Plaintiffs' motion for leave to file a surreply in opposition to defendants' motion to stay pending appeal from Thursday, September 18, 2025 to Thursday, September 4, 2025. Any response to such motion shall be due no later than Wednesday, September 3, 2025.

There is good cause to expedite the noting date of Plaintiffs' motion for leave to file a surreply. First, Defendants have stated that they take no position on the relief requested in the motion for leave to file a surreply. Second, the Court has already set hearing on Defendants' motion to stay pending appeal for Thursday, September 4, 2025.

Counsel for Plaintiffs conferred with counsel for Defendants who indicated that Defendants "do not oppose the motion to expedite the noting date."

1 Dated this 28th day of August 2025.

2 Respectfully submitted,

3 /s/ Matthew P. Gordon

4 Matthew P. Gordon, WSBA No. 41128

5 Abdul Kallon, WSBA No. 60719

6 **Perkins Coie LLP**

7 1201 Third Avenue, Suite 4900

8 Seattle, Washington 98101-3099

9 Telephone: 206.359.8000

10 Facsimile: 206.359.9000

11 Email: MGordon@perkinscoie.com

12 Email: AKallon@perkinscoie.com

13 Danielle Sivalingam (*pro hac vice*)

14 **Perkins Coie LLP**

15 505 Howard Street, Suite 1000

16 San Francisco, CA 94105-3204

17 Telephone: 415.344.7000

18 Facsimile: 415.344.7050

19 Email: DSivalingam@perkinscoie.com

20 Mary Grace Thurmon (*pro hac vice*)

21 Bo Yan Moran (*pro hac vice*)

22 **Perkins Coie LLP**

23 3150 Porter Drive

24 Palo Alto, CA 94304-1212

25 Telephone: 650.838.4300

26 Facsimile: 650.838.4350

Email: MThurmon@perkinscoie.com

Email: BMoran@perkinscoie.com

Gabriella Romanos Abihabib (*pro hac vice*)

Perkins Coie LLP

1155 Avenue of the Americas, 22nd Floor

New York, NY 10036-2711

Telephone: 212.262.6900

Facsimile: 212.977.1649

Email: GRomanos@perkinscoie.com

Sasha Buchert (*pro hac vice*)

Lambda Legal Defense and

Education Fund, Inc.

815 16th St. NW, Suite 4140

Washington, DC 20006
Telephone: 202.804.6245
Facsimile: 855.535.2236
Email: SBuchert@lambdalegal.org

Jennifer C. Pizer (*pro hac vice*)
**Lambda Legal Defense and
Education Fund, Inc.**
800 South Figueroa Street, Suite 1260
Los Angeles, CA 90017
Telephone: 213.382.7600
Facsimile: 855.535.2236
Email: JPizer@lambdalegal.org

Camilla B. Taylor (*pro hac vice*)
Kenneth Dale Upton, Jr. (*pro hac vice*)
**Lambda Legal Defense and
Education Fund, Inc.**
3656 N Halsted St.
Chicago, IL 60613
Telephone: 312.663.4413
Facsimile: 855.535.2236
Email: CTaylor@lambdalegal.org
Email: KUpton@lambdalegal.org

Omar Gonzalez-Pagan (*pro hac vice*)
**Lambda Legal Defense and
Education Fund, Inc.**
120 Wall Street, 19th Floor
New York, NY. 10005-3919
Telephone: 212.809.8585
Facsimile: 855.535.2236
Email: OGonzalez-Pagan@lambdalegal.org

Kell Olson (*pro hac vice*)
**Lambda Legal Defense and
Education Fund, Inc.**
3849 E Broadway Blvd, #136
Tucson, AZ 85716
Telephone: 323.370.6915
Facsimile: 855.535.2236
Email: KOlson@lambdalegal.org

Cynthia Cheng-Wun Weaver (*pro hac vice*)
Ami Rakesh Patel (*pro hac vice*)

Human Rights Campaign Foundation

1640 Rhode Island Ave. N.W.

Washington, DC 20036

Telephone: 202.527.3669

Facsimile: 202.347.5323

Email: Cynthia.Weaver@hrc.org

Email: Ami.Patel@hrc.org

Attorneys for Plaintiffs